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December 27, 2023

BY ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Eric Rodriguez*, 20 Cr. 77 (SHS)

Dear Judge Stein:

I represent Eric Rodriguez in the above-referenced § 2255 motion. I write to respectfully request a 60-day extension of time to file a response to the Government's filing, currently due December 29, 2023. As of last writing, Mr. Rodriguez had recently been transferred to FCI Allenwood, which only permits attorney-client calls by scheduling in advance through an inmate's assigned unit counselor. Despite several unanswered calls and voice mails, I have not yet heard back from Mr. Rodriguez's counselor. I have recently been advised, however, that the counselor has been out for several weeks, returning "after the holidays." An adjournment would permit counsel to meaningfully confer with Mr. Rodriguez; to obtain necessary documentation; and to complete trial in the matter of *US v. James Kelly*, 23 Cr. 113 (DEH), scheduled to begin January 29, 2024. This is Mr. Rodriguez's fourth request for an extension, and the Government does not object to this request. Accordingly, I respectfully request a 60-day extension of time to file defendant's response. We thank the Court for its time and consideration of this matter.

Respectfully submitted,



Michael D. Bradley

cc: AUSA Thomas Burnett (via ECF)

12/27/23
Defendant's response to
gov't's filing is due
February 29, 2024.
So ordered.
Sidney H. Stein
U.S.D.S.